IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA,

V.

CASE NUMBER

Filed 01/13/2008

2:06-CR-169-WHA-SRW

CHRISTOPHER IMAN ULMER, **DEFENDANT.**

MOTION TO CONTINUE SENTENCING

COMES NOW, the defendant, Christopher Iman Ulmer, by and through the undersigned counsel and moves this Honorable Court for a sixty (60) day continuance of the sentencing date by stating the following:

- 1. That sentencing in this matter is currently set for January 22, 2008.
- 2. Defendant entered into a cooperation agreement with the Government that states the Government will move for a downward departure at sentencing to reflect the Defendant's continued cooperation with the Government.
- 3. The Defendant continues to fulfill his obligations pursuant to the plea agreement with the Government.
- 4. Counsel for the Defendant has spoken to the Government's counsel and there is no objection to the requested continuance.

WHEREFORE, THE PREMISES CONSIDERED, Defendant prays that this Honorable Court will grant the foregoing and continue the Defendant's sentencing hearing for sixty (60) days or to the next Trial term.

RESPECTFULLY SUBMITTED this the 13th day of January, 2008.

/s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043) ATTORNEY FOR THE DEFENDANT 560 S. McDonough St., Ste. A MONTGOMERY, ALABAMA 36104 TELEPHONE 334-269-0269 FAX 334-323-5666

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of this Motion to Continue Sentencing by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorney named below.

DONE this the 13th day of January, 2008.

/s/ Daniel G. Hamm

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